

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

Andrew Salinas
A208 153 837
United States Citizen

YOB:

PRINCIPAL
1992United States District Court
Southern District of Texas
FILED

MAR 28 2015

CRIMINAL COMPLAINT

Case Number:

M-15-475-M

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 27, 2015 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Baudelio Morales-Roblero, a national of Guatemala, and Mayda Elizabeth Matias-Castro, a national of the El Salvador, along with twenty-one (21) other undocumented aliens, for a total of twenty-three (23), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is from a location near Roma, Texas to the point of arrest near Fronzon, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONYI further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On March 27, 2015, while assigned to line watch duties near Fronzon, Texas, Border Patrol Agent Joshua Monahan responded to a request for assistance from Aerostat 5 (A-5) Operator near Fronzon, Texas. A-5 reported that approximately 37 subjects had illegally crossed the border into the United States near Roma, Texas. Several minutes later, A-5 then advised that the group was moving north into a neighborhood in Fronzon, Texas. A fixed wing air asset, identified as Falcon 1, advised he was in the area and had visual of the subjects. Falcon 1 reported the group in the neighborhood had loaded into two separate vehicles, a Ford F-150 Double Cab, and four door SUV.

Falcon 1 and A-5 maintained their view of both vehicles as agent Joshua Monahan and other agents responded. Falcon 1 advised the SUV had dropped off a large group of people into the brush around an area known as "The Y" on FM 650. At this time, Border Patrol Agent G. Salinas conducted a vehicle stop on the SUV and made contact with the driver, later identified as Andrew of Roma, Texas, and placed him under arrest. Falcon 1 then advised the F-150 had dropped off the second group of people into the brush at the southwest corner of the Cisneros Compound property, and the juvenile driver, C.C., had fled on
SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Sworn to before me and subscribed in my presence,

March 28, 2015

Date

Dorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial Officer
at McAllen, Texas
City and State

Signature of Judicial Officer

Michael Chandler Senior Patrol Agent
Printed Name of Complainant

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

475
M-15- -M

RE: Andrew Salinas

A208 153 837

CONTINUATION:

foot into the brush. Falcon 1 advised agents on the ground of the driver's location. The juvenile driver, C.C., was subsequently apprehended.

After a search of both areas, agent Joshua Monahan and other agents were able to apprehend a total of twenty-three subjects whom were all illegally present in the United States. After the determination of alienage, all of the subjects were then placed under arrest and were transported to the Rio Grande City Border Patrol Station for processing.

PRINCIPAL STATEMENT 1:

Andrew SALINAS was read his Miranda Rights via Form I-214 by Border Patrol Agent (BPA) B. Cuevas witnessed by BPA R. Medrano. SALINAS understood his rights and waived his rights by signing his name on Form I-214.

SALINAS stated today he was in Fronton, Texas picking up illegal immigrants. SALINAS stated he was driving a tan Trail Blazer but he didn't know how many people got inside his vehicle. SALINAS stated a subject with an alias "Mouse" asked him if he wanted to pick up illegal immigrants in Fronton. SALINAS stated he has picked up illegal immigrants twice before in Fronton and he was hired both times by Mouse. SALINAS stated his first time, 3 weeks ago, he picked up ten illegal immigrants in Fronton and took them to a stash house in Roma, Texas, and that time the illegal immigrants in his vehicle paid him \$100.00 US Dollars each. The second time, four days ago, he picked up ten illegal immigrants in Fronton and took them to another stash house in Roma, this time Mouse paid him \$100.00 US Dollars each. Salinas stated he was arrested by Border Patrol 5 years ago for transporting an illegal immigrant, but he was released because he was 17 years old at the time of arrest.

MATERIAL WITNESS STATEMENT 1:

Once at the Rio Grande City, Texas Border Patrol Station, Baudelio MORALES- Roblero was read his rights via form I-214 by Border Patrol Agent B. Cuevas and witnessed by Agent E. Lujano. MORALES- Roblero acknowledged his rights and agreed to answer questions without the presence of an attorney by signing his name on form I-214.

MORALES- Roblero stated he made his arrangements with a subject and paid him \$15,000 Quetzal. MORALES- Roblero stated when he arrived to Reynosa, Mexico he took a bus to Miguel Aleman, once in Miguel Aleman he took a taxi to a warehouse where they stayed for seven days. MORALES- Roblero stated he is traveling with his wife. MORALES- Roblero stated a car picked them up and took them to the river where two guides crossed a total of 34 of them. MORALES- Roblero stated they crossed the river walking. MORALES- Roblero stated once at the river's edge they waited until the guide told 14 of them to run towards the pick up vehicle. Moments later

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475
M-15- -M

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A208 153 837

CONTINUATION:

started to drive off. MORALES- Roblero stated the door closed after. MORALES- Roblero stated he was scared because it was 20 of them in the vehicle and it was uncomfortable. MORALES- Roblero stated the driver told them to get off the vehicle, the driver never stopped completely and as he was getting off the vehicle the driver took off. MORALES- Roblero positively identified the driver of the brown Trail Blazer as Andrew Salinas in space #5 from a photo lineup.

MATERIAL WITNESS STATEMENT 2:

Once at the Rio Grande City, Texas Border Patrol Station, Mayda Elizabeth MATIAS-Castro was read her rights via form I-214 by Border Patrol Agent B. Cuevas and witnessed by Agent E. Lujano. MATIAS-Castro acknowledged her rights and agreed to answer questions without the presence of an attorney by signing her name on form I-214. MATIAS-Castro stated she left Guatemala with her husband who made all the arrangements. MATIAS-Castro stated once in Mexico they walked, used taxi, and bus until they arrived to Reynosa, Mexico where they took a bus to Miguel Aleman. MATIAS-Castro stated once in Miguel Aleman they went to a warehouse where they stayed for seven days. MATIAS-Castro stated a car picked them up and took them to the river. MATIAS-Castro stated once in the river 33 of them walked across with two guides. MATIAS-Castro stated the guides told 14 of them to run towards the vehicle that was going to pick them up, soon after they ran towards a tan vehicle. MATIAS-Castro stated she was laying on the floor of the vehicle with several others on top of her making it hard to breath. MATIAS-Castro stated the driver told them to get off and they all started to jump off the vehicle because the driver never stopped the vehicle. MATIAS-Castro positively identified the driver of the brown Trail Blazer as Andrew Salinas in space #3 from a photo lineup.